

July 11, 2008

E-19J

Ms. Katherine S. Jones
Federal Aviation Administration, Detroit Airports District Office
11677 South Wayne Road
Suite 107
Romulus, Michigan 48174

Re: Comments on the Port Columbus International Airport Draft Environmental Impact Statement (DEIS), City of Columbus, Ohio, EIS No. 20080181

Dear Ms. Jones:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the United States Environmental Protection Agency (U.S. EPA) Region 5 has reviewed the Port Columbus International Airport Draft Environmental Impact Statement (DEIS).

The proposed project is to reconstruct Runway 10R/28L in a way that preserves the airport's current and future flexibility to accommodate capacity needs both on the airfield and in the terminal and landside areas. Key objectives are: (1) provide long-term airfield capacity and delay reduction during peak operating periods, (2) provide sufficient terminal capacity to accommodate projected passenger growth, (3) provide sufficient ancillary facilities to support the projected increase in air transportation demand, and (4) enhance the human environment by reducing noise impacts on the surround communities.

FAA evaluated off-site and on-site alternatives to address the problems stated in the project's purpose and need. We concur with the alternatives analysis process that was used by FAA to reach the alternatives to be environmentally assessed in the DEIS. Those alternatives are:

- Alternative A: No Action (No Runway Development, No Terminal Development)
- Alternative C2: Relocate Runway 10R/28L to the south by 800 feet
- Alternative C3: Relocate Runway 10R/28L to the south by 702 feet

Both build alternatives would include the development of new terminal facilities in the midfield area, with aircraft access from the south airfield. Concurrent with the runway and terminal development alternatives, several procedural alternatives were evaluated in the DEIS for their ability to reduce noise exposure around the Port Columbus International Airport. Each of the build alternatives includes two options for operational procedures to

reduce noise exposure (Noise Abatement Scenario A and Noise Abatement Scenario B). FAA did not identify a preferred alternative in the DEIS.

U.S. EPA began working with FAA on the Port Columbus International Airport project in June 2006 when FAA hosted an initial scoping meeting to summarize the project and resource areas that required analysis. U.S. EPA participated in extensive scoping discussions focusing on the analysis required for air quality starting in July 2006. Through FAA's coordination efforts since 2006, the project proponents sought input from U.S. EPA and other resource and permitting agencies regarding the project's purpose and need and alternatives analysis. U.S. EPA did not have any comment on these parts of the analysis. The DEIS includes the analysis that was discussed via interagency coordination meetings. Therefore, we have no concerns regarding how resource impacts were analyzed. However, we have some remaining comments regarding air quality, energy efficiency and sustainability, and noise that should be considered while developing the Final Environmental Impact Statement.

EPA has comments on Particulate Matter-2.5 microns or less (PM_{2.5}) and mitigation measures that could help minimize PM_{2.5} emissions. The project area is an existing non-attainment area for PM_{2.5}. Increases of PM_{2.5} are problematic, even if they are below de minimus levels, because they add to the cumulative emissions in the airshed. A more restrictive 24-hour standard for PM_{2.5} will be in place about the same time as the project is implemented, if a build alternative is selected. We recommend the development and implementation of a comprehensive mitigation plan that includes specific air mitigation measures, such as, a comprehensive diesel emissions reduction program for construction and operation and measures to address hazardous air pollutants emissions from aircraft taxiing and idling. Our detailed comments on air quality and potential mitigation are enclosed.

We understand that the Columbus Regional Airport Authority (CRAA), which manages the three airports in Columbus, including Port Columbus International Airport, already has a proactive environmental program that includes elements such as a municipal waste recycling program, alternative fuel programs for air quality and energy efficiency, and the implementation of an Environmental Management System. This project is a unique opportunity to implement green airport design, construction, operation, and maintenance elements. Such elements might include gate electrification, green roofs, use of recycled-content materials, and other sustainability measures. We encourage the project sponsors to consider this project in light of those programs and include relevant information about those programs in the Final Environmental Impact Statement.

Based on our review of the information provided in the DEIS and the comments we have provided on air quality, we have rated the DEIS as EC-2. The "EC" means that we have environmental concerns with respect to the proposed action, and the "2" indicates that additional information needs to be provided in the Final Environmental Impact Statement (FEIS) to alleviate these environmental concerns. Our rating applies to each of the build alternatives presented in the DEIS. We have enclosed a summary of U.S. EPA's rating system under NEPA.

Thank you for the opportunity to comment on the DEIS for this project. We are willing to meet and discuss our concerns with you. If you have any questions, please contact me at (312) 886-2910. The staff person assigned to this project is Sherry Kamke; she can be reached at (312) 353-5794 or via email at kamke.sherry@epa.gov.

Sincerely yours,

/s/

Kenneth A. Westlake, Supervisor
NEPA Implementation
Office of Enforcement and Compliance Assurance

Enclosures (2)

- (1) Detailed Comments on the Port Columbus International Airport DEIS
- (2) U.S. EPA's Summary of NEPA Rating Definitions and Follow-up Actions

Detailed Comments on the Port Columbus International Airport Draft Environmental Impact Statement (DEIS) Columbus, Ohio

Air Quality

Criteria Pollutants

FAA provided documentation of expected emissions for criteria pollutants. The documentation shows that the project build alternatives increase the amount of criteria pollutants emitted when compared to the No Action alternative. The increase is far below the de minimus threshold. Therefore, general conformity requirements beyond the de minimus demonstration do not apply.

Particulate Matter- 2.5 microns or less (PM2.5)

The project area is currently a non-attainment area for PM2.5. As indicated above, the increase in PM2.5 expected from project implementation does not meet or exceed the de minimus threshold. Therefore, additional general conformity evaluations are not needed. However, the data in the DEIS shows an increase in PM2.5 emissions from 53.28 tons/year of PM2.5 (existing 2006 conditions) to about 69 tons/year of PM2.5 in 2012 regardless of the build alternative implemented. A large part of the PM2.5 emissions is attributable to aircraft emissions. Increases of PM2.5 are problematic, even if they are below de minimus, because they add to the cumulative emissions in the airshed. Additionally, during the construction timeframe for this project (2009 -2011), a new PM2.5 standard will be effective. The Columbus area will once again be assessed for attainment status with respect to the new, more restrictive 24-hour standard. Exposure to diesel exhaust by construction workers and those nearby a construction site can have serious health implications. We believe this project is a significant construction project because of the size and duration of the project, its proximity to residential areas, the use of diesel equipment during construction, and the existing problems with PM2.5 in the area. For these reasons, we recommend that FAA and the project proponents evaluate and consider implementing any mitigation measures that would reduce PM2.5 emissions from operations at the airport, as well as from construction activities.

Mitigation

The project at the Port Columbus International Airport is an opportunity to re-evaluate activities at the airport in order to identify potential mitigation measures that would have measurable beneficial effects. This project is a unique opportunity to implement green airport design, construction, operation, and maintenance elements. We encourage the project sponsors to consider this project in light of those programs and include relevant information about those programs in the Final Environmental Impact Statement.

We understand that the Port Columbus International Airport already has a proactive environmental program. We recommend that the project sponsor consider extending their program to include minimization of diesel emissions. Diesel emissions, which also contribute to nitrous oxides (NOx), PM10, and PM2.5, can cause serious adverse health and

environmental effects. Other than contributions from aircraft, construction equipment and operations-related ground support equipment (GSE) are large contributors to diesel particulate matter emissions. We encourage FAA to work with the project sponsors to assess options for a comprehensive Airport Diesel Emissions Reduction Program that would address diesel emissions from multiple source categories in construction, ground transportation, and airport operations. Such a program would include at a minimum:

- Retrofitting off-road construction equipment including repower or engine upgrades.
- Requiring use of low sulfur or ultra-low sulfur fuels and construction equipment fitted with U.S. EPA or California Air Resource Board (CARB)-verified retrofit technologies.
- Limiting the age of on-road vehicles in construction projects to 1998 and newer and the age of off-road equipment to 1996 and newer.
- Implementing of a fugitive dust control plan.
- Using diesel particulate traps and oxidation catalysts.
- Using existing power sources or clean fuel generators rather than temporary power generators.
- Encouraging the use of off-road equipment that meets the Tier 3 standards.
- Converting all diesel ground support equipment to compressed natural gas, propane, or electric power.
- Using alternate fuel and retrofits for internal bus and shuttle transportation.
- Implementing time and transportation management practices and oversight that would minimize idling and queuing of diesel construction equipment and ground support equipment.

Additionally, since hazardous air pollutants from aircraft are emitted during the idling mode, it is important to encourage the airlines to adopt practices to reduce jet aircraft idling. We understand that there are many factors to consider, such as ability to implement a change, commercial availability of options, and anticipated benefits versus implementation costs. We are enclosing links to specifications for diesel vehicle emissions controls that you may find useful:

<http://www.epa.gov/midwestcleandiesel/projects/index.html>

http://egov.cityofchicago.org/webportal/COCWebPortal/COC_EDITORIAL/const001.pdf

Energy Efficiency and Sustainability

We understand that Port Columbus International Airport already has a proactive environmental program that includes elements such as a municipal waste recycling program, alternative fuel programs for air quality and energy efficiency, and the implementation of an Environmental Management System. This project is a unique opportunity to expand these programs at Port Columbus International Airport. In particular, we recommend that the Port Columbus International Airport project team consider green airport design, construction, operation, and maintenance elements. We encourage FAA and the project sponsor to fully consider, and if possible, commit to modernizing 100% of existing gates and other operational areas with utility connections to reduce the use of auxiliary power units.

Additional elements worth considering in green design include the use of green roofs, use of recycled-content materials, diverting materials from landfills, energy efficient lighting, and other sustainability measures.

We recommend that the FEIS discuss how this project has considered these measures. The City of Chicago's Sustainable Design Manual for the O'Hare Modernization Program contains many useful ideas that may be of interest to you as you progress with design. Many of the practices mirror the U.S. Green Building Council Leadership in Energy and Environmental Design (LEED) principles. We recommend that you consider using as many of these practices as feasible. This information about Chicago's Sustainable Design Manual is available at:

http://egov.cityofchicago.org/webportal/COCWebPortal/COC_EDITORIAL/OMPSustainableDesignManualCopywrite2003cityofChicago.pdf

Noise

The DEIS evaluated two noise abatement scenarios in conjunction with the build alternatives. The analysis shows that the noise contours for 2012 conditions and 2018 conditions (as compared to the no action alternative) are shifted south because the runways are moved south. The 2012 and 2018 contours for C2 and C3 are larger than the contours associated with the No Action Alternative (Alternative A). For alternatives C2 and C3 (utilizing either of the two noise abatement scenarios), new areas would be included in the 65+ DNL noise contours. The proposed mitigation for the build alternatives is offering sound insulation to homes affected by significant noise levels (an increase in noise of DNL 1.5 db or more, or noise exposure above 65 dB when compared to the No Action alternative). It appears that each of the build alternatives (C2 and C3), when evaluated in conjunction with the noise abatement scenarios, will affect different populations, not necessarily more residential units than under No Action. We recommend that the FAA do all they can to reduce noise impacts, including fully implementing the sound insulation program to offset significant noise levels.

SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION*

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1-Adequate

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640 Policy and Procedures for the Review of the Federal Actions Impacting the Environment

